

CSFM - Improving O&M, OQ, & IMP Procedures

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Topics:

- Intent of pipeline regulations
- Procedure improvement ideas
- Other common compliance problems
- Website resources
- Summary
- Questions

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Intent:

When dealing with compliance issues, remember to think about the *intent* of the regulation in determining a course of action.

Pre-amble discussion and rule making comments are a good source for finding intent.

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Intent of Pipeline Regulations

“provide adequate protection
against risks to life and property
posed by pipeline transportation”

[49 USC Sec. 60102]

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Procedure Improvement Ideas:

- Reading the regulation (PHMSA and CSFM) & stay current
- Review PHMSA/CSFM FAQs, advisory bulletins, interpretation letters
- Review industry standards (API, ASME, NACE, etc.)

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Procedure Improvement Ideas: (cont.)

- Use audit feedback from company & industry groups
- Use proper procedure writing format, grammar, and peer review
- Include enough info to answer who, what, why, where, when

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Procedure Test

Test:

If you handed a new operator a procedure, would they know how to complete the task?

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Regulatory Review of Procedures

195.402(c)(13):

Periodically review the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Other Common Compliance Problems

Other Compliance Problems:

- Record keeping: standard forms, missing info, sup. review
- Timely completion and tracking of O&M tasks
- Maximum operating pressure and overpressure protection
- Continuing surveillance reviews
- Defining roles & responsibilities

Agency Website Resources

Federal:

- **PHMSA**: <http://ops.dot.gov/>
- **TSI**: <http://www.tsi.dot.gov/divisions/pipeline/pipeline.htm>
- **NPMS**:
<https://www.npms.phmsa.dot.gov/>
- **Government printing office** (GPO)
<http://www.gpoaccess.gov/index.html>

State:

- **CSFM**:
<http://osfm.fire.ca.gov/pipelinehome.html>

Industry Website Resources

Industry:

- WRPO: www.regcs.com
- API: www.api.org
- NACE: www.nace.org
- ASME: www.asme.org

Training:

- Clarion: www.clarion.org
- Pipeline Safety Institute:
www.pipelinesafetyinstitute.com

What if I have questions?

- Keep reading, learning, and asking questions
- Contact your supervisor, compliance advisor, or company peer group
- Join an industry group
- Andy Bradfield

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THANKS

CS Inc Would Like to
Thank You for your support
and participation